

United States District Court

NORTHERN

DISTRICT OF

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

CASE NUMBER: 3-12-MJ- 351.BH

MICHAEL SIMONEAUX, JR.

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 6, 2012 in Dallas County, in the Northern District of Texas defendant(s) did,


Mail threatening communications,

in violation of Title 18 United States Code, Section(s) 876(c).

I further state that I am a(n) Special Agent of the United States Secret Service (USSS) and that this complaint is based on the following facts:

See attached Affidavit of Special Agent Tjamas D. Matthews, USSS, which is incorporated and made a part hereof by reference.

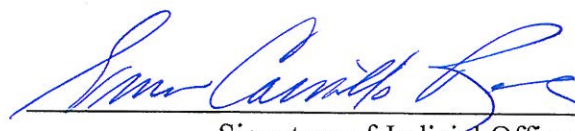
Continued on the attached sheet and made a part hereof: XX Yes No



Signature of Complainant
TJAMAS D. MATTHEWS
Special Agent, USSS

Sworn to before me and subscribed in my presence, on this 14th day of August 2012, at Dallas, Texas.

IRMA C. RAMIREZ
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Tjamas D. Matthews, being duly sworn, do hereby depose and state the following:

1. I am employed by the United States Secret Service and am currently assigned to the Dallas Field Office. I have been employed by the U.S. Secret Service since February of 2003. I have conducted and participated in numerous investigations involving threats against the President of the United States. Prior to my employment with the U.S. Secret Service, I was employed as an Officer with the Dallas Police Department.
2. The following facts were acquired as a result of my personal investigation, as well as that of other agents of the U.S. Secret Service and the Richardson Police Department.
3. On 08/06/12, the U.S. Secret Service, Dallas Field Office, was notified by the Dallas Police Department that Michael Simoneaux was being arrested and transported to Green Oaks Psychiatric Hospital for threatening to kill local citizens and President Obama, Former President George W. Bush, and Former President Clinton.
4. On 08/08/12, SA Andrew Dooher, Austin Resident Office, informed the Dallas Field Office that the Texas Governor's Office in Austin received a threatening letter from an unknown individual from the Dallas District. SA Dooher forwarded the letter to the Dallas Office since the subject stated in this letter that an agent from the Dallas Field Office was aware of him. SA Chad Smith identified the letter as belonging to Michael Simoneaux. This letter contained threats to both the Governor of Texas, Rick Perry, as well as to President Barack

Obama. The author of the letter was Michael Simoneaux, Jr. The letter contained the following threatening language:

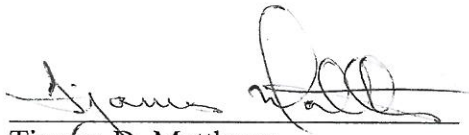
"I'm gonna kill ya by burning u @ my steak then having a Roast Ricky 4 my breakfast, lunch, and dinner. Then personally send ur fuckin ass to fuckin hell to spend da rest of ur eternal life. I will kill Obama 2! Call Chad a Secret Service, he knows Mikey well. I'll kill him 2, then fuck his wife with-out a rubber over and over until she gets impregnated with her 3rd child. I aint scared of no ghosts!.

5. Continuing on this date, affiant was contacted by Detective Willadsen, Richardson Police Department, stating that he was contacted by a citizen who received a threatening letter in the mail from an unknown individual. Detective Willadsen recovered the letter and discovered that the letter also threatened to kill President Obama and a Special Agent named "Thad" of the Secret Service, Dallas Field Office. The affiant received a copy of the letter and identified the writing to be similar to the letter written to the Texas Governor's Office by Michael Simoneaux.
6. Also on 08/08/12, affiant contacted a representative at Green Oaks Psychiatric Hospital who stated that the subject was transported to Medical City Hospital in McKinney. The subject was located at that hospital and interviewed by the affiant and Detective Willadsen that day. During the interview, the subject made several statements as to being angry with President Obama and others. The subject stated, "That nigger Obama needs to die." When asked about several threatening letters that were mailed to individuals stating that he was going to kill them,

including the letter to Governor Perry, the subject stated that Governor Perry was killing the economy in Texas. The subject stated that he was angry with other recipients of the letters because they "were lying on him." When asked how many letters he had written, the subject stated he has written approximately fifteen threatening letters to citizens, churches, businesses and political officials.

7. On 08/09/12, affiant received additional letters from victims who stated that they received letters in the mail threatening to kill them and commit horrible sexual crimes against their wives. Each of these victims contacted the Secret Service because the letters included threats to kill President Obama and a Secret Service agent named "Thad." The affiant received faxed copies of these letters. Affiant believes that the letters were written by Michael Simoneaux.
8. Continuing on this date, affiant met with Glen Bowling, Apartment Manager of Tyler Manor, 922 W. 9th Street, Dallas, Texas. Bowling confirmed that Michael Simoneaux resides at this address in apartment 701. Bowling further stated that the subject was not there because he had been arrested by Dallas Police Department. Affiant asked Bowling about the arrest, Bowling stated that the subject was no longer taking his medicine and was threatening several of the tenants. Bowling stated that he had received several letters from the subject stating that he was going to kill him and others. Bowling provided the affiant with a copy of the letter in which the subject threatened to kill him. Two tenants were interviewed at this location. Both individuals stated that they have received threatening mail, emails, text messages, and verbal threats from the subject within the last couple of weeks.

9. The threatening letters written by Michael Simoneaux were knowingly deposited in a United States post office or other authorized repository for mail matter to be sent or delivered by the Postal Service, and the letters contained threats to injure other persons. These letters were delivered to the victims by the Postal Service.
10. Based on the affiant's personal observation, training and experience as a United States Secret Service Agent, information obtained from other law enforcement agents, and the facts set out in the Affidavit, the affiant believes and has reason to believe that there is probable cause that Michael Simoneaux, Jr. has committed a federal criminal offense, specifically, violation of Title 18, United States Code Section 876(c), Mailing Threatening Communications.


Tjamas D. Matthews
Special Agent, U.S. Secret Service

Sworn and subscribed before me this 14th day of August 2012.


IRMA C. RAMIREZ
United States Magistrate Judge